

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**NICOLE WRAY AND ZACHARY  
STERDIVANT**

**PLAINTIFFS**

**v.**

**CIVIL ACTION NO. 3:18-cv-622-DPJ-FKB**

**GEICO INDEMNITY COMPANY,  
ET AL.**

**DEFENDANTS**

**MOTION TO COMPEL 30(B)(6) DEPOSITION OF  
GEICO INDEMNITY COMPANY AND FOR SANCTIONS**

COMES NOW the Plaintiff, Nicole Wray, by and through the undersigned attorney, and files this *Motion to Compel 30(b)(6) Deposition of GEICO Indemnity Company and for Sanctions*. In support thereof, Plaintiff files the supporting *Memorandum in Support*, which fully sets for the basis for the relief sought therein.

**WHEREFORE, PREMISES CONSIDERED**, Plaintiff requests that the Court grant Plaintiff's motion and the relief set forth therein.

Respectfully submitted this, the 27<sup>th</sup> day of November, 2020.

Plaintiff, Nicole Wray

BY: /s/ R. Kevin Hamilton  
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*Attorney for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on that above date that I electronically filed the foregoing document with the Clerk of the Court using the ECF system which served a copy of said filing to all counsel of record

/s/ R. Kevin Hamilton  
R. Kevin Hamilton